



Construction Services

486131

September 22, 2000

Mr. Paul Peronard  
US EPA  
EPR-SA  
999 18th St, Suite 500  
Denver, CO 80202

Mr. Paul Peronard  
US EPA  
501 Mineral Avenue  
Libby, Montana 59923

Not  
Approved

Re: Addendum 8 to Approved Work Plan dated July 28, 2000  
Libby Asbestos Site (#8-BC), Libby, Lincoln County, Montana

Dear Mr. Peronard:

Please find attached, for your review and approval, Addendum No. 8, to amend the start of removal activities for the western property surface debris; transportation to and disposal at the mine.

Thank you in advance for your immediate attention with this matter. Please call if you have any questions concerning this submittal.

Sincerely,

Jim Stout  
Project Coordinator  
Libby Asbestos Site

RL/nm

cc: Jon Constan, Montana Department of Environmental Quality (3 copies)  
Ken Lund, Holme Roberts & Owen  
Bob Mariam, WR Grace  
David Cleary, WR Grace  
Karen Brown, WR Grace  
Matthew Cohn, US EPA

URS Corporation  
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**ADDENDUM NO. 8****Work Plan – Removal of Asbestos and Vermiculite  
at the Export Plant, Libby Asbestos Site  
28 July 2000**

This addendum to the 28 July 2000 Work Plan for the removal of asbestos and vermiculite at the Libby Asbestos Site is issued to amend the sequence of performing surface debris removal for the western portion of the site, while maintaining the safety of the public and contractor personnel.

On 20 September 2000, the EPA and WR Grace reached an agreement that debris on the western portion of the site, consisting of lumber and materials to be disposed of at the mine may be initiated prior to full site enclosure and movement of Millwork West retail operation, providing that all activities be performed after the daily closure of Millwork West retail sales. This time—after 5:00 p.m. on the day(s) approved by EPA—will allow removal after public use. This enables an early start on the property surface debris removal in an effort to complete surface excavation before severe winter weather.

URS proposes to accomplish this in strict adherence to the Work Plan Health and Safety procedures, Air Monitoring procedures and documentation reporting to assure the EPA that the early start in removal operations were performed in a manner protecting the public and allowing Millwork West to continue daily site operations until relocated to the new temporary pole barn structures (Section 2.1.6 of the Work Plan) off Highway 2 scheduled for completion on 30 September 2000.

To accomplish the removal, URS and Koch Environmental Health, Inc. (KEH) will isolate activities to the west end of the property. One person will be stationed outside the work area to keep unauthorized personnel from entering the work zone. All work will cease if unauthorized persons enter the work zone. The personnel decontamination trailer unit will be utilized for personnel access and egress. Street clothes will be doffed and donned in the clean room.

Work will be accomplished as follows:

1. After 5:00 p.m. removal activities on the day(s) approved by the EPA, URS employees, in full PPE including respirators and Tyvek<sup>®</sup>, using a fork lift and by

hand, will load debris into 12 cubic yard dump trucks for transportation and disposal at the mine. Dust will be controlled by keeping the ground thoroughly wet.

2. Impacted materials, debris for disposal, including used PPE, will be removed from the west side of the property in 12 cubic yard trucks covered with a tarp as approved for disposal at the mine.

In accordance with Appendix A (Sampling and Analysis Plan), KEH will implement perimeter monitoring during operations. KEH will also monitor personnel per the Health and Safety Plan.

This surface debris removal action does not result in a final surface cleaning. There will be no clearance sampling involved in this activity.

All other applicable procedures of the Work Plan relating to transportation for, and disposal at the mine, apply.

This early start on surface removal enables WR Grace to proceed rapidly with work activities, assuring completion per the revised schedule limits, not adversely affecting the Millwork West retail business, and protects the health and safety of the public, agency, or contractor personnel.

Activities initiating removal will begin as soon as possible. Complete west sided debris removal is scheduled for 7 October 2000.

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Signature

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Date

\_\_\_\_\_  
Printed Name of Signer